ADEQ
ARKANSAS
Department of Environmental Quality

Interoffice Memorandum

TO : Clay McDaniel, Engineer, HWD

FROM : Jay Rich, Sr. Epidemiologist–Risk Assessment Supervisor, HWD

DATE : July 14, 2009

SUBJECT : Focused Feasibility Study Report - Site 3 - Former Cedar Chemical Facility

I have reviewed the Focused Feasibility Study Report - Site 3 for the Former Cedar Chemical Facility, which was submitted by AECOM on behalf of Tyco Safety Products – Wormald U.S., Inc.

This report concludes that Alternative 2 is the preferred remedial alternative for dinoseb in subsurface soil at Site3. Alternative 2 involves the implementation of institutional controls. In this case, a deed restriction would be placed on the on-site soils which would limit exposure to future construction workers. Based on the calculations, concentrations of dinoseb in subsurface soils would degrade to levels that would meet the RGO (1.5mg/kg) for protection of groundwater in approximately 10 years. Furthermore, modeled predictions indicate current concentrations of dinoseb will not impact alluvial aquifer groundwater down-gradient of Site 3. These conclusions are based data from 5 soil borings in a 10 X 10 foot area at a depth range from 4 to 8 feet, the same depth interval which the high concentration of 13,000 mg/kg of dinoseb was detected in 1996.

Based on my review of the Focused Feasibility Study Report - Site 3, I have the following comments and concerns:

- After approximately 13 years, the higher concentrations of dinsoseb have potentially migrated to depths greater than 8 feet. It is unknown if higher concentrations of dinoseb are present at depths great than 8 feet.
- According to RAGS Part E, it is recommended to assume 100% ABS_{GI} value for organic chemical not appearing in exhibit 4-1. The RGO calculations for dinoseb in the report use a value of 0.5 ABS_{GI}. These calculations should be revised using 100% ABS_{GI} value.

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